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Buchwald, N.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE LIBOR-BASED FINANCIAL  
INSTRUMENTS ANTITRUST LITIGATION

MDL No. 2262, 11 Civ. 2613

THIS DOCUMENT RELATES TO: EXCHANGE-  
BASED PLAINTIFFS' ACTION

Master File No. 1:11-md-2262-NRB

ECF Case

**STIPULATION AND ~~PROPOSED~~ ORDER**

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for the Exchange-Based Plaintiffs and the undersigned counsel for defendant Société Générale that:

1. Société Générale was added as a defendant to Exchange-Based Plaintiffs' Second Amended Consolidated Class Action Complaint, dated September 10, 2013, following the Court's August 23, 2013 memorandum and order granting Exchange-Based Plaintiffs leave to do so. Exchange Based Plaintiffs subsequently filed a [Corrected] Second Amended Consolidated Class Action Complaint, dated September 16, 2013 ("Second Amended Complaint").

2. Société Générale's joining in Defendants' Motion for Reconsideration of March 29, 2013 Order on Motion to Dismiss shall be without prejudice to or waiver of Société Générale's right to seek leave from the Court to file its own motion to dismiss the Second Amended Complaint.

3. Société Générale's joining in Defendants' Motion for Leave to File Renewed Motion to Dismiss the Exchange-Based Plaintiffs' Period 2 CEA Claims shall be without prejudice to or waiver of Société Générale's right to seek leave to file its own motion to dismiss the Second Amended Complaint.

4. The parties will endeavor to submit a joint proposed briefing schedule in connection with Société Générale's anticipated motion for leave to file motion to dismiss the

Second Amended Complaint, and/or to otherwise work with the Court to achieve scheduling efficiency in light of the other motions pending in this action.

Dated: September 23, 2013

KIRBY McINERNEY LLP

By:

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*Attorneys for Société Générale*

SO ORDERED:

*Karen Peusi Ducharme*  
U.S.D.J.  
9/27/13